

JOSEPH W. MURRAY, ESQ.

185 Great Neck Road, Suite 461
Great Neck, New York 11021

T: (646) 838-1702

F: (646) 514-4771

E: Joe@Jmurray-law.com



ADMITTED TO PRACTICE

New York State
Eastern District of New York
Southern District of New York

JMURRAY-LAW.COM

August 12, 2022

Via: Email to the Chambers and all parties

Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Djonibek Rahmankulov, 20 Cr. 653 (RA)
Defendant's response to Government's 7/25/2022 letter
motion *in limine*, filed under seal.**

Dear Judge Abrams:

I write on behalf of defendant Djonibek Rahmankulov in response to the Government's 7/25/2022 letter *motion in limine* seeking an order precluding cross-examination of two of the Government's anticipated witnesses with respect to (1) evidence of a dismissed domestic violence battery case from 2013, and (2) an arrest for a violation of a domestic protective order.

Preliminarily, I have consulted with the Government earlier in the week about this issue wherein I communicated to the Government that the defense does not intend on conducting cross-examinations of these witnesses regarding these completely unrelated domestic violence arrests, unless these witnesses took the stand and falsely claimed that they have never been arrested before. The only other possible reason why I would seek to preserve my right to cross-examine only witness-2 on this material would be if the Government revealed that witness-2 was promised favorable treatment on the open domestic protection order case, in exchange for witness-2's testimony in the instant criminal case. That not being the case, I repeat that I have no intention of cross-examining either witness regarding their unrelated domestic violence cases.

Respectfully,

Joseph W. Murray, Esq.

Cc: to all parties via ECF